AMENDMENTS TO THE DRAWINGS

Proposed drawing changes are shown on the attached annotated marked up

drawing and are incorporated within an attached proposed replacement sheets of

drawings.

Attachment: Replacement Sheet(s)
                Annotated Sheet Showing Changes

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REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

In response to the drawing objection, a replacement sheet for Figure 1 is attached (together with an annotated marked-up sheet showing the changes made) including additional labels as requested.

In response to the formality-based objections to claims 1-6 and 8-12, the claims have been amended above (or cancelled) so as to obviate each stated ground of objection.

In response to the objection made to the original Abstract, the Abstract has been amended to put it into more traditional US format.

In response to the objection to the specification as failing to provide proper antecedent basis for the subject matter of claim 15, the specification has been amended at page 8 to more explicitly state with those in the art will already have appreciated from the original description. Namely, that the described domains are physically realized by computer-based hardware (e.g., servers, etc.) executing computer program code (instructions) fetched from computer readable computer program storage media. Especially considering that the original claims constitute part of the original disclosure, it is not believed that this amendment includes any "new matter".

In response to the rejection of claims 14 and 15 under 35 U.S.C. §101 as allegedly directed to non-statutory subject matter, similar new claim 18 has been drafted as

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suggested by the Examiner so as to make it clear that this claim is directed to a "machine" or "manufacture" and thus clearly within the realm of statutory subject matter.

The Examiner's assertion that paragraph [0036] of applicant's specification somehow telegraphs an intent to interpret "media" to include transient "signals" is not understood. While paragraph [0036] does certainly discuss transient signals being transmitted from one place to another (and/or received at a particular place), the undersigned cannot find any statement in paragraph [0036] implying that applicant intends to interpret "media" to include transient "signals".

At the same time, the Examiner's statements about "energy" not being "physical" are respectfully traversed. Clearly energy has detectable physical attributes -- just as does matter. The presence of energy in numerous forms can be sensed by both humans and machines. Energy can do useful work and convey information from one place to another. Energy is clearly "physical" in nature. Furthermore, the manipulation of raw "energy" in accordance with a predetermined *modus operandi* to encode and transmit information from one site to another can, and often does, involve physical process steps or acts -- including a series of such physical steps or acts required to suitably modify the physical characteristics of such energy and thus such *modus operandi* does clearly encompass a "process" as well under 35 U.S.C. §101.

Accordingly, all outstanding formal issues are now believed to have been resolved in the applicant's favor.

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The rejection of claims 1-3 and 6-15 under 35 U.S.C. §102 as allegedly anticipated by Gupta '384 is respectfully traversed.

Among other things, applicant's original independent claim 1 required the <u>client application</u> to initiate a <u>secure</u> connection in response to receipt of a notification from the notification server. For this, the Examiner apparently relies upon Gupta at 10:25-30 -- but the cited text appears only to relate to a signed applet which the client is required to download and run in expectation of receiving communication from the notification server. As near as the undersigned can ascertain from the following text at column 10 (and indeed from the title found at 9:55 for this entire Example 3 section), this deals with forwarding a notification from the notification server to the client.

In any event, Gupta does not appear to be much concerned with security issues -- and there is thus very little if any discussion of security issues in Gupta. Accordingly, it is not believed possible for Gupta to <u>anticipate</u> any of applicant's claims. Suffice it to note that, as a matter of law, it is impossible for a reference to anticipate any claim unless it teaches each and every feature of that claim.

However, the Examiner has also cited Osterman '211 (discussed below) which is believed to be more pertinent than Gupta in that security is there considered -- albeit security appears to be provided individually by each server application (i.e., as the part of the APC functionality).

To better avoid the combined teachings of Gupta and Osterman, applicant's new independent claims 16 and 17 have now been drafted to more specifically cover features

of the exemplary embodiment whereby a gateway provides common services to multiple

server applications, including notification sending and the securing of incoming

connections. See, for example, the applicant's explanatory statements concerning the

invention at page 3 of the specification.

The way in which applicant combines a notification server with shared security

features gives rise to an overall system which is not described or rendered obvious by the

cited prior art. In particular, there is synergy in providing these two functions in a

combined manner within a "gateway" as a general service provided to a number of

underlying applications.

The purpose of the notification is to inform clients that they need to contact the

servers via the gateway and the reason that the client should contact the gateway (and not

the other way around) is to enable security features in the gateway to function effectively.

Their functions are clearly interlinked and it is therefore more efficient if these services

are somehow combined together. This idea of a gateway providing common services to a

number of underlying server applications, which services include security functions

associated with incoming connections and providing notifications going in the other

direction, is not described in any of the cited documents.

It will be noted that new independent claims 16 and 17 are directed to aspects of

applicant's system and method respectively which facilitate such combined common

services to multiple server applications -- and are believed to be patentably distinct from

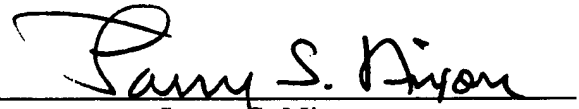the cited prior art for reasons already discussed.

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Claims dependent directly or indirectly from these new independent claims 16-17

are also believed to be allowable for even further reasons related to the additional

recitations of these claims.

Accordingly, this entire application is now believed to be in allowable condition

and a formal Notice to that effect is respectfully solicited.

Respectfully submitted,

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